

IN THE COURT OF COMMON PLEAS
CLERMONT COUNTY, OHIO
CIVIL DIVISION

TOTAL QUALITY LOGISTICS, LLC

Plaintiff,

v.

THOMAS "CARTER" NEAL, *et al.*,

Defendants.

Case No. 2024CH1774

JUDGE

FERENC

**MOTION OF PLAINTIFF TOTAL
QUALITY LOGISTICS, LLC FOR
EXPEDITED DISCOVERY**

Pursuant to Civ. R. 26, Plaintiff Total Quality Logistics, LLC ("TQL"), moves for expedited discovery so that the parties can properly prepare for a hearing on TQL's Motion for Preliminary Injunction. Specifically, TQL respectfully requests that the Court order Defendants to provide TQL with complete answers, responses, and documents within ten (10) days of the service (with the Complaint) of TQL's Civ. R. 33, 34, and 36 requests. TQL further asks that the Court order Defendants to produce any party witnesses for a four (4) hour deposition in advance of the preliminary injunction hearing yet to be scheduled. A memorandum in support is attached as well as a Proposed Order (Exhibit A).

Respectfully submitted,

/s/ Scott K. Jones

Scott K. Jones (0069859)

SKJ LAW

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Counsel for Plaintiff Total Quality Logistics, LLC

FILED

2024 DEC 11 AM 10:57

BARBARA A. WIEDENBEIN
CLERK OF COMMON PLEAS COURT
CLERMONT COUNTY, OH

MEMORANDUM IN SUPPORT

TQL is serving Defendants with discovery under Rules 33, 34, and 36 with the formal service of the Complaint via overnight carrier.

Rules 33, 34, and 36 specifically permit the Court to shorten the length of time within which a party must respond to interrogatories, document requests, and requests for admissions. Here, TQL asks that the Court order the Defendants to respond fully to TQL's Discovery Requests (which are intentionally narrow) within ten (10) days. Expedited responses are needed so that TQL can have the evidence needed to depose the Defendants and properly prepare for the upcoming preliminary injunction hearing. A Proposed Order is attached as Exhibit A.

Respectfully submitted,

/s/ Scott K. Jones

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sjones@skj-law.com

Counsel for Plaintiff Total Quality Logistics, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion for Expedited Discovery was served by FedEx via the Clerk's service of the Verified Complaint on the following:

Thomas "Carter" Neal
2732 Gaston Gate
Mt. Pleasant, SC 29466

Devine Logistics, Inc.
1993 NITSA ST
JOHNS ISLAND, SC 29455-8124

Devine Logistics, Inc.
C/O Wesley D. Bryant, Ra
5608 Katy Hill Rd
Wadmalaw IS, SC 29487

/s/ Scott K. Jones
Scott K. Jones (0069859)